

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, New York 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

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May 31, 2022

By ECF

The Honorable Hector Gonzalez
United States District Court Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Wildman v. Deutsche Bank Aktiengesellschaft, et al.*,
No. 21 Civ. 4400 (E.D.N.Y.) (HG) (RML)

Dear Judge Gonzalez:

We represent defendants Danske Bank A/S and Danske Markets Inc. in the above-captioned matter, and we write on behalf of our clients and all other defendants that have appeared in this matter (Deutsche Bank Aktiengesellschaft, Deutsche Bank Trust Company Americas, Standard Chartered Bank, Standard Chartered PLC, Standard Chartered Bank (Pakistan) Limited, and Placid NK Corporation d/b/a Placid Express) (collectively, “Defendants”) regarding the pending motions to dismiss and the application of Your Honor’s Individual Practices.

Prior to the reassignment of this matter to Your Honor, the presiding judge, Judge Matsumoto, had held a pre-motion conference on December 7, 2021 and set a briefing schedule whereby Defendants’ motions to dismiss would be due March 18, 2022; Plaintiffs’ oppositions would be due May 13, 2022; and Defendants’ replies would be due June 3, 2022. *See* Dec. 7, 2021 Minute Entry. In addition, Judge Matsumoto ordered that, consistent with her Individual Practices, the parties adhere to the so-called “bundling rule,” by which the papers in support of and in opposition to the motions are served but not filed until June 3, at which point the parties are to “file via ECF, in a logical order, the fully briefed motions to dismiss.” *Id.*

The parties have adhered to this schedule, having served their respective papers on March 18 and May 3 and now expect to serve replies on June 3 and then file all papers via ECF. Defendants recognize that, per Your Honor’s Individual Practices, Your Honor does not follow the “bundling rule,” instead requiring that motion papers be filed and served simultaneously. Accordingly, the parties propose that, in advance of the June

3 reply deadline, each of the Defendants will file their motion papers, after which Plaintiffs will file their oppositions.

In addition to the “bundling rule,” the parties have further followed Judge Matsumoto’s Individual Practices in respect to the motion papers, which, among other requirements that differ from Your Honor’s Individual Practices, provide that memoranda of law may be up to 30 pages and do not provide page limitations on exhibits.

Because the parties have already served the moving papers and oppositions consistent with Judge Matsumoto’s Individual Practices, the parties also respectfully request that Your Honor excuse the differences from your Individual Practices and accept the moving papers and oppositions as served. Defendants will ensure that the reply briefs conform to Your Honor’s Individual Practices.

Thank you for your consideration.

Respectfully submitted,

/s/ *Brian T. Frawley*

Brian T. Frawley

cc: All Counsel of Record (by ECF)